

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TELECOM BUSINESS SOLUTION, LLC, *et al.*, X
Petitioners, : Civil Action No.: 1:22-cv-01761
v. :
TERRA TOWERS CORP., *et al.*, : Judge Lewis A. Kaplan
Respondents. : Magistrate Judge Robert W.
Lehrburger :
X

**[PROPOSED] ORDER ON PETITIONERS' MOTION TO HOLD RESPONDENTS IN
CIVIL CONTEMPT AND FOR CONTEMPT SANCTIONS**

This matter is before the Court on Telecom Business Solution, LLC and LATAM Towers, LLC (collectively, “Peppertree”) and AMLQ Holdings (Cay) Ltd.’s (“AMLQ,” together with Peppertree, “Peppertree/AMLQ”) Motion to Hold Respondents in Civil Contempt and for Contempt Sanctions (the “Motion”). Having considered the Motion and any other filings made either in support of or in opposition to the Motion, and being sufficiently advised;

It is hereby **ORDERED** as follows:

1. Peppertree/AMLQ’s Motion is GRANTED.
2. Respondents Terra Towers Corp. and TBS Management, S.A. are held in civil contempt and subject to contempt sanctions, jointly and severally, in the amount of a \$2,500 daily fine, increasing by \$1,000 per day following each subsequent ten calendar day period of non-compliance thereafter (*i.e.*, the daily sanction increases to \$3,500/day following 10 calendar days of further non-compliance, \$4,500/day following an additional 10 calendar days of non-compliance, etc.), for their failure to comply with their payment obligations pursuant to the January 18, 2023 Order and Judgment of this Court and the First Partial Final Award confirmed therein.

So **ORDERED** and **SIGNED** this _____ day of _____, 2023.

The Honorable Lewis A. Kaplan
United States District Court Judge